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February 6, 2019

VIA EMAIL: [REDACTED]
& U.S. MAIL

[REDACTED]

Re: Robbins Research Int'l., Inc. / [REDACTED]
Our File No. 1470-281

Dear [REDACTED]

This letter is in furtherance of my prior correspondence to you concerning your client, [REDACTED]. You have failed to respond to my prior requests that Mr. [REDACTED] preserve and maintain all written and electronic communications with all persons affiliated with *BuzzFeed*, including all emails, text messages and social media communications. Accordingly, I can only assume that Mr. [REDACTED] intends to destroy or delete evidence of his communications with *BuzzFeed*. As stated by my prior correspondence, such conduct by Mr. [REDACTED] would violate California law.

In addition, we are informed that Mr. [REDACTED] met with *BuzzFeed* reporter, Jane Bradley, last week in Florida. We have likewise demanded that *BuzzFeed* maintain and retain all communications between Jane Bradley and Katie Baker of *BuzzFeed* with Mr. [REDACTED], including any recording of the communications that Ms. Bradley may have made with Mr. [REDACTED] during their meeting last week.

I trust that you will advise your client accordingly.

All rights, claims and remedies on behalf of our client are reserved.

Very truly yours,

BRIAN G. WOLF

of

LAVELY & SINGER
PROFESSIONAL CORPORATION

BGW/mj